

Terri Jenkins
11939 Canyon Valley Drive
Tomball, TX 77377

United States Courts
Southern District of Texas
FILED

FEB 03 2020

UNITED STATES DISTRICT COURT David J. Bradley, Clerk of Court
SOUTHERN DISTRICT OF TEXAS

In re:

Terri Jenkins,

Civil Action No.: 4:19-cv-04759

Case No.: 19-33769

Chapter: 13

Debtor.

VERIFIED MOTION FOR ENLARGEMENT OF TIME
TO FILE OPENING BRIEF

Appellant moves for an extension of time of 90 days to file her Opening Brief, up to and including April 5, 2020. There is good cause for the motion. The matter is so complex, from the point of view of a pro se litigant, that an adequate brief cannot reasonably be prepared when due.

1. The brief is due February 5, 2020.
2. This is the first request for more time.
3. The length of the requested extension is 90 days.
4. The basis for the request is: I am not an attorney and am not trained in legal matters. I need additional time to research the issues.
5. I hereby represent that I have exercised diligence and that the brief will be filed within the time requested.
6. There is no other party separately represented.
7. The court reporter is not in default with regard to any designated transcripts.
8. This motion is made in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

Respectfully submitted,

Dated: February 3, 2020


Terri Jenkins, Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the date last written below I served the foregoing document on the following by depositing it in the U. S. Mail, first class postage prepaid addressed, as follows:

William E. Heitkamp
Office of Chapter 13 Trustee
9821 Katy Freeway, Ste 590
Houston, TX 77024

US Trustee
515 Rusk Street, Suite 3516
Houston, TX 77002

BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

Capital One Bank (USA), N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083

CARRINGTON MORTGAGE SERVICES LLC
1600 SOUTH DOUGLASS ROAD
SUITE 200-A
ANAHEIM CA 92806

CARRINGTON MORTGAGE SERVICES LLC
C CHARLES TOWNSEND
AKERMANLLP
2001 ROSS AVENUE SUITE 3600
DALLAS TX 75201

CARRINGTON MORTGAGE SERVICES LLC
WALTER MCINNIS
AKERMAN LLP
200 I ROSS A VENUE SUITE 3600
DALLAS TX 75201

CARRINGTON MORTGAGE SERVICES LLC
MONICA SUMMERS
AKERMAN LLP
112 E PECAN STREET SUITE 2750
SAN ANTONIO TX 78205

CREDIT ONE BANK
PO BOX 60500
CITY OF INDUSTRY CA 91716

INTERNAL REVENUE SERVICE
P O Box 7346
Philadelphia PA 19101-7346

JC PENNEY
PO BOX 960090
ORLANDO FLORIDA 32896

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

MERCURY CARD SERVICES
POBOX84064
COLUMBUS GA 31908

NATHAN SANCHEZ
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

NATHAN SANCHEZ
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

REX KESLER
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100

ADDISON TX 75001

REX KESLER
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

SHAWNIKA HARRIS
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

SHAWNIKA HARRIS
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

T Mobile/T-Mobile USA Inc
by American InfoSource as agent
PO Box 248848
Oklahoma City, OK 73124-8848

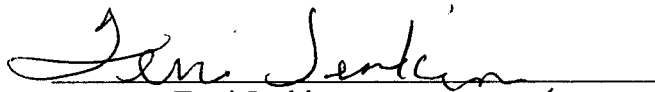
TARGET CARD SERVICES
P.O. BOX 660170
DALLAS TX 75266-0170

THE BANK OF NEW YORK MELLON AS TRUSTEE
MONICA SUMMERS
AKERMAN LLP
112 E PECAN STREET SUITE 2750
SAN ANTONIO TX 78205

THE BANK OF NEW YORK MELLON AS TRUSTEE
WALTER MCINNIS
AKERMAN LLP
2001 ROSS AVENUE SUITE 3600
DALLAS TX 75201

THOMAS REDER
BARRETT DAFFIN FRAPPIER TURNER AND ENGEL LLP
4004 BELT LINE ROAD SUITE 100
ADDISON TX 75001

Dated: February 3, 2020


Terri Jenkins